

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Lolita Cheatham)
)
) Case No. 16-31848-KLP
)
)
) Chapter 13
Debtor(s))
10254 Brading Ln)
Midlothian, VA 23112)
)
Last four digits of Social Security No(s).: 4617.)
)
)

NOTICE OF MOTION (OR OBJECTION)

Debtor(s) have filed papers with the court to Extend the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before May 9, 2016, you or your attorney must:

File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294

[] Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

[X] Attend the hearing on the motion (or objection) scheduled to be held on May 11, 2016 at 10:00 a. m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 4/25/2016

Signature, name, address, and telephone number of person giving notice:
/s/ Richard J. Oulton
Richard J. Oulton, Esq. VSB 29640
America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294
Counsel for Lolita Cheatham

Certificate of Service

I hereby certify that I on April 25, 2016, I have mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton
Richard J. Oulton, Esq.

Creditors

Bon Secours
PO Box 28538
Henrico, VA 23228-0000

PO Box 988
Harrisburg, PA 17108-0000

Cavalry Investments LLC
500 Summit Lake Dr. Ste 400
Valhalla, NY 10595-0000

Check City
PO Box 970183
Orem, UT 84097-0000

Cavalry Portfolio Services
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340

Check City
re: Bankruptcy
6001 West Broad Street
Richmond, VA 23230-0000

Central Credit/Penn Cr
Attn: Bankruptcy

CHECK CITY
2729-B WEST BROAD ST.
RICHMOND, VA 23220

CJW Medical Center
PO Box 13620
Richmond, VA 23225-0000

Convergent Outsourcing
10750 Hammerly Blvd #200
Houston, TX 77043-0000

Credit Acceptance
25505 W 12 Mile Rd, Ste 2300
Southfield, MI 48034-0000

Dominion Virginia Power
PO Box 26543
Richmond, VA 23290-0001

DriveTime Credit Co
attn: Bankruptcy
PO Box 29018
Phoenix, AZ 85038-0000

Eastern Account System of Conn
PO Box 837
Newtown, CT 06470-0000

Enhanced Recovery Corporation
8014 Bayberry Rd
Jacksonville, FL 32256-7412

Extra Spce Storage
7000 Hull Street Rd
Richmond, VA 23224-0000

HCA Henrico Doctors Hospital
1602 Skipwith Road
Henrico, VA 23229-0000

Henrico Doctor's Hospital
PO Box 13620
Richmond, VA 23225-8620

International Collection Servi
c/o Jefferson Capital Systems
PO Box 7999
Saint Cloud, MN 56302-0000

Jefferson Capital Systems
16 McLeland Rd
Saint Cloud, MN 56303-0000

MCV Associated Physicians
830 E Main St
Suite 1900
Richmond, VA 23219-0000

National Credit Systems
PO Box 312125

Atlanta, GA 31131-2125

Navy Federal Credit Union
PO Box 3000
Merrifield, VA 22119-3000

Parrish and LeBar, LLP
5 E Franklin St.
Richmond, VA 23219-0000

Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Seventh Avenue
re: Bankruptcy Dep't
112 7th Ave
Monroe, WI 53566-1364

Spinella, Owings & Shaia
8550 Mayland Dr, Ste 1
Henrico, VA 23294-0000

Sprint
Attn: Bankruptcy Dept
4900 W. 95th Street
Oak Lawn, IL 60453-0000

Sprint Corp
attn: Bankruptcy Dept
PO Box 7949
Overland Park, KS 66207-0000

Sprint PCS
PO Box 54977
Los Angeles, CA 90017-0000

Suntrust Bank
Support Services/RW 7941
PO Box 85052
Richmond, VA 23286-0000

Town and Country Apts
1402-D Barriedale Road
Richmond, VA 23225-0000

VCU Health System -- MCV Hosp.
Set-off Debt Section
PO Box 980462
Richmond, VA 23298-0462

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Lolita Cheatham

Case No. 16-31848-KLP
Chapter 13

Debtor(s)

MOTION TO EXTEND AUTOMATIC STAY

COMES NOW the Debtor(s), by counsel, and offer the following Memorandum in Support of Debtor(s)' Motion to Extend Automatic Stay:

JURISDICTION

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor(s).
2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. §1409.

BACKGROUND FACTS

4. On **April 13, 2016** (hereinafter the "Petition Date") , the Debtor(s) filed in this Honorable Court a petition for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the "instant case").

5. Suzanne Wade was appointed to serve as Chapter 13 trustee in this case (the "Trustee").

6. Within the year prior to filing the instant case, Debtor(s) have been Debtor(s) in one (1) pending Chapter 13 bankruptcy case (the "previous case"), which was filed on 10/24/2014 and dismissed on 11/2/2015 (Case No. 14-35714).

7. The previous case was dismissed by the court for failure to make plan payments and an inability to cure the default.

FACTS OF THE INSTANT CASE

8. Discussion and argument regarding the current case will be contained in the Memorandum, which will be filed at a later date.

WHEREFORE, the Debtor respectfully requests this Honorable Court to enter an Order extending the automatic stay as to all creditors, as to Debtor(s) and Debtor(s)' property, and as to the property of the estate for the duration of the instant case, and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,
Lolita Cheatham

By: /s/ Richard J. Oulton
Richard J. Oulton

America Law Group, Inc.
8501 Mayland Dr., Suite 106
Henrico, VA 23294
Phone: 804-308-0051
Fax: 804-308-0053

CERTIFICATE OF SERVICE

I certify that on April 25, 2016, a copy of this Motion to Extend the Automatic Stay was mailed via first-class mail, postage full pre-paid, to Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780, the United States Trustee, 701 E. Broad Street, Suite 4304, Richmond, VA 23219 and all creditors as set forth on the attached mailing matrix.

/s/ Richard J. Oulton
Richard J. Oulton, Esquire
Counsel for Debtor(s)

Creditors

Bon Secours

PO Box 28538
Henrico, VA 23228-0000

Cavalry Investments LLC

500 Summit Lake Dr. Ste 400
Valhalla, NY 10595-0000

Cavalry Portfolio Services

500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340

Central Credit/Penn Cr

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1602 Skipwith Road
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